UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE: AFTERMARKET FILTERS ANTITRUST LITIGATION

Master Docket No. 08-cv-4883 MDL Docket No. 1957

This Document Relates To: Direct Purchaser Actions Judge Robert W. Gettleman Magistrate Geraldine Soat Brown

DIRECT PURCHASER PLAINTIFFS' MOTION FOR FINAL APPROVAL OF SETTLEMENTS

The Direct Purchaser Plaintiffs respectfully move this Court to enter the Order for final approval of the settlements reached between the Direct Purchaser Plaintiffs and Defendants Champion Laboratories, Inc., Honeywell International, Wix Filtration Corp. LLC, Affinia Group Inc., Cummins Filtration Inc., Donaldson Company, Inc. and Baldwin Filters, Inc. In support of this Motion, Direct Purchaser Plaintiffs submit their Memorandum in Support of their Motion for Final Approval of Settlements.

WHEREFORE, and for the reasons stated in the accompanying Memorandum of Law in Support of Their Motion for Final Approval of Settlements and the Declaration of Michael J. Freed, Direct Purchaser Plaintiffs' respectfully request that the Court issue an Order finally approving the settlements and for such other and further orders as the Court deems appropriate.

Dated: September 4, 2012

Respectfully submitted,

/s/ Michael J. Freed

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